

Hearing Date: March 22, 2005  
At: 10:00 A.M.  
Objection Deadline: March 17, 2005  
At: 5:00 P.M.

TOGUT, SEGAL & SEGAL LLP  
Bankruptcy Counsel for the Debtor  
and Debtor in Possession  
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Daniel F. X. Geoghan (DG-3132)

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: Case No. 04-15389 [BRL]  
SALTIRE INDUSTRIAL, INC., :  
: Debtor.  
:-----x

**NOTICE OF DEBTOR'S FIRST OMNIBUS OBJECTION SEEKING  
TO DISALLOW AND EXPUNGE CERTAIN CLAIMS AGAINST THE ESTATE  
(CLAIM NOS. 95, 189, 220, 224, 231, 236, 237, 239, 259, 260, 277, 290, 335, 342, 345, 358)**

TO ALL PARTIES ON THE ANNEXED SERVICE LIST:

**PLEASE TAKE NOTICE** that upon the annexed objection (the "Objection"), Saltire Industrial, Inc. (the "Debtor"), by its attorneys, Togut, Segal & Segal LLP, will move before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 623, One Bowling Green, New York, New York 10004-1408, on March 22, 2005 at 10:00 AM (the "Hearing"), or as soon thereafter as counsel may be heard, for entry of an Order disallowing and expunging certain claims filed against the Debtor's estate.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief sought by the Debtor's Objection must be in writing, conform to the requirements of the Bankruptcy

Code, the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the Southern District of New York, and must be filed and served so as to be received no later than 5:00 p.m. on March 17, 2005 (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that pursuant to General Order M-182, any objection filed by parties with legal representation shall be filed on or before the Objection Deadline (i) through the Bankruptcy Court's Electronic Case Filing System ("ECF") which may be accessed at the Bankruptcy Court's Internet web site at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), using Netscape Navigator software version 3.0 or higher, and (ii) in portable document format ("PDF") using Adobe Exchange software for conversion.

**PLEASE TAKE FURTHER NOTICE** that any party that is either without legal representation or that is unable to file documents electronically shall file its objection on or before the Objection Deadline in PDF format on a 3-1/2" floppy diskette in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the document.

**PLEASE TAKE FURTHER NOTICE** that any party that is either without legal representation or that is unable to file documents electronically or create documents in PDF format, shall file its objection on or before the Objection Deadline in either Word, WordPerfect or DOS text (ASCII) format on a 3-1/2" floppy diskette in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the document.

**PLEASE TAKE FURTHER NOTICE** that a hard copy of any objection must be delivered to the Chambers of the Honorable Burton R. Lifland, at the United States Bankruptcy Court for the Southern District of New York, Room 625, One Bowling Green, New York, New York 10004-1408, on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, must be served in accordance with the provisions of General Order M-182 so that they are received on or before

the Objection Deadline by Togut, Segal & Segal LLP, attorneys for the Debtor, One Penn Plaza, New York, New York 10119, Attn: Anthony M. Vassallo, Esq.

DATED: New York, New York  
February 15, 2005

SALTIRE INDUSTRIAL, INC.,  
Debtor and Debtor in Possession  
By its Bankruptcy Counsel,  
TOGUT, SEGAL & SEGAL LLP,  
By:

/s/Scott Ratner  
SCOTT E. RATNER (SER-0015)  
A Member of the Firm  
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